Attorney Docket No.: Q78873

AMENDMENT UNDER 37 C.F.R. § 1.114(c) U.S. Application No.: 10/764,510

## **REMARKS**

This Amendment, submitted in response to the Office Action dated March 9, 2007, and Advisory Action dated June 21, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-2, 4-16, and 18-40 are now all the claims pending in the application. Claims 3 and 17 have been canceled from the Application.

Applicant submits that the art cited by the Examiner does not teach the elements of claims 1-2, 4-16, and 18-40. Specifically, an exemplary embodiment of the present invention is directed to classifying media files based on metadata, and automatically generating actual file directories (folders) including the link files of the classified media files, or the media files themselves. The user can navigate or edit the automatically generated file directories using a media-file-management program such as Windows Explorer. Hence, the user can easily search desired media files, and easily perform editing (for example, deleting or adding) by file directories or media files.

However, Mercer (U.S. 7,043,477) generates a playlist, and navigates media files within the playlist, so only the playlist is stored in the actual file directory. That is, Mercer integrally stores media files in a certain area of the storage medium regardless of the file type, and generates a file directory including the playlist in another area of the storage medium. According to FIGS. 11 to 13, and line 49 of column 19 to line 6 of column 20, the file directories are classified and generated to include only the playlist, but do not include actual media files or the link files of the media files.

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Therefore in Mercer, because media files are not classified by file directories, and the media player must be used to use the playlist, it is not easy for the user to search for media files, or edit

file directories including the media files.

Therefore, Applicant submits that Mercer does not teach at least automatically creating file directories based on metadata of the media files, executing a media file management program, and reading and navigating the created file directories using the media file management

program, as claimed.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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